

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Comments on Petition of Alliance for Telecom.	)	
Industry Solutions 800 Service Management	)	
System Number Administration Committee	)	CC Docket No. 95-155
Requesting Bureau Action to Revise Toll-Free Code	)	
Opening Methodology	)	

**REQUESTING A DELAY FOR THE OPENING OF 833.**

I understand the pressures and demands on things at the FCC and the concerns of potentially changing the opening process for the new toll free 833 area code. The Alliance for Telecommunications Industry Solutions (ATIS) SMS/800 Number Administration Committee (SNAC) originally wrote requesting changes to the methodology of opening 833 and future toll free codes on October 30, 2015. Many parties submitted comments in June 2016. This was originally scheduled for April 22, 2017 and now approximately 18 months later the proposed opening of 833 is just **10 days away** and to my knowledge, no confirmation of the process or any of the changes have been finalized.

There were a number of helpful changes suggested but some of them could potentially require some advance notice to implement. Somos has been preparing for months and testing for what they expect it to be, and I am confident they'll do a good job of implementing whatever process the FCC orders. But everyone especially the public, needs and deserves to know ahead of time, HOW this will work. Phone companies and customers wishing to participate need time to set up and promote their request process and deserve at least some notice as to what changes are going to be in place and some time to notify their customers and the public

*Therefore I'd like to request that the opening of 833 be delayed at least two months, until **Saturday June 24th, 2017**. That would give the FCC time to finalize the process and allow everyone else involved at least 30 days to announce and implement it smoothly. (It's always been on a Saturday to minimize the disruption of regular business, and doing it at the end of the month, before the month end update is helpful too.)*

**BACKGROUND AND USAGE LEVELS**

I am attaching the latest Number Administration Summary Report for 4/8/2017 which as of 11:59pm, Eastern Time, shows that there has been negative growth in toll free number usage during the past month from 3/4 to 4/8. That makes the estimated months to exhaust

somewhat meaningless, but suffice it to say with 6.5 million spare numbers I believe the downside of waiting a month or two, to insure that both the FCC has time to finalize the process and the industry has time to promote and deal with it are more than reasonable.

Additionally I went back to look at the exhaust level before the previous openings of 855 and 844, and found that when 855's opened in October 2010, there was 2.8 million spare toll free numbers. When 844's opened in December of 2013, there was only 2.9 million spare toll free numbers. So from an inventory point of view, delaying the 833 opening slightly won't hurt in the long run. I wouldn't want to delay it more than a couple months though because we've already been promoting it and probably most companies have taken requests already, some even collected fees up front. So for consistency's sake I don't want it to be delayed longer than it takes to confirm, announce and implement the process smoothly.

### Changes to the Process

Just to review the proposed changes, I believe everyone was on board with reducing the rationing period from 30 to 20 days. I believe everyone was on board with doing the rationing per organization, not per resporg since some organizations have multiple resporgs and you're not trying to give companies an incentive to have multiple resporgs. There was some question on who would determine that or how you defined an organization, but I believe Somos has analyzed that. And depending on the FCC's instructions, they may or may not be able to properly determine which resporgs are connected or resolve any disagreements in the week remaining but they certainly could if they had a month.

The more controversial change that was proposed was to require each resporg to submit the customer details for every number reserved during the rationing period. Somos said that it couldn't collect the customer information properly and couldn't survey them about the process. In my final comments I said that the customer survey wasn't necessary and that the customer details for reservations during the rationing period should simply be submitted to the FCC directly. That would resolve completely all of the Somos concerns.

The FCC already has longstanding rules which strictly prohibit warehousing, hoarding, and brokering of toll free numbers.<sup>1</sup> In addition, Commission rules provide that a toll free number may only be reserved at the request of a legitimate end user customer and may not be reserved with the intent of selling said number for a fee.<sup>2</sup>

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<sup>1</sup> See 47 C.F.R. § 52.105(a) defining warehouse as the "...practice whereby Responsible Organizations, either directly or indirectly through an affiliate, reserve toll free numbers from the Service Management System database without having an actual toll free subscriber for whom those numbers are being reserved."); *see also* 47 C.F.R. § 52.107(a) "hoarding is the acquisition by a toll free subscriber from a Responsible Organization of more toll free numbers than the toll free subscriber intends to use for the provision of toll free service. The definition of hoarding also includes number brokering, which is the selling of a toll free number by a private entity for a fee.").

<sup>2</sup> *See generally* 47 C.F.R. §§ 52.101-52.111 for compliance with the Commission's toll free rules.

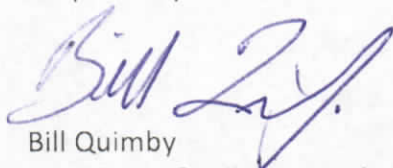
Since the Commission rules against hoarding apply to the end user as well as the phone companies the rationing period should too. I propose that the FCC not only require each phone company to include the customer contact information for numbers taken during the rationing period but further, that no customer or end user be allowed to reserve more than 10 numbers during the 20 day rationing period. This wouldn't affect very many regular customers and wouldn't take much additional work, but would benefit every phone company and most of all, the end users. Large volume customers that use toll free numbers for tracking purposes don't typically want specific numbers, and can certainly wait three weeks and reserve as many numbers as they want on day 21.

This small step wouldn't require any additional work or monitoring by Somos and would only require a secure way for phone companies to submit this information to the FCC. The FCC wouldn't have to follow up or do much with this information but would have it if there were ever a question about hoarding. It would require very little work but would prevent issues ahead of time and insure that customers are following the regulations rather than having to enforce them somehow after the fact. If rationing is good for phone companies wouldn't the same principle benefit end customers and complete the rationing process. I also think it's important that both the phone companies and the end users know that the FCC is serious about enforcing these rules which are in everyone's best interests.

In looking back through the FCC submissions at the time the rationing was being considered I found a number of end user comments that still seem applicable today. In fact end users arguing for rationing (of 855 numbers at that time) seem even more relevant if the Commission is considering rationing the numbers to end users. So I have attached a collection of the customer comments submitted in September of 2010. If I announced that you wanted more I'm sure you'd get many more but I think this makes the point pretty clearly. Especially given the success of the rationing per resporg or organization.

I hope this suggestion helps to give the Commission time to finalize and announce the 833 release plans and for Resporgs and phone companies to have time to announce things and for the public to hear about and benefit from this. My only goal is to make this as smooth and beneficial to everyone as possible.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Bill Quimby".

Bill Quimby  
President of TollFreeNumbers.com  
bill@tollfreenumbers.com  
1-800 MARKETER

**Bulletin Number:** NUM-10-40  
**Date:** 04-Oct-10  
**Subject:** Number Administration Summary Reports for Saturday, 10/2/2010 as of 11:59 PM, Eastern Time

	STATUS										
	WORKING	ASSIGNED	RESERVED	DISCONNECT	TRANSIT	UNAVAIL	SUSPEND	TOTAL NUMBERS IN USE	PERCENT IN USE	SPARE	TOTAL POOL (In Use + Spare)
NPA: 800	7,803,141	6,683	3,210	24,684	21,082	11,260	13	7,870,073	100.00%	0	7,870,073
NPA: 866	7,720,086	9,411	17,602	80,782	103,931	1,500	2	7,933,314	99.41%	46,686	7,980,000
NPA: 877	6,431,769	5,340	58,209	36,784	57,892	1,500	2	6,591,496	82.60%	1,388,504	7,980,000
NPA: 888	6,567,969	502	9,154	25,832	38,947	3,109	4	6,645,517	83.28%	1,334,466	7,979,983
TOTAL:	28,522,965	21,936	88,175	168,082	221,852	17,369	21	29,040,400	91.29%	2,769,656	31,810,056

**CLOSED 800-NXX'S:** ALL 0XX AND 1XX CODES (000-199)  
 271; 389; 415; 534; 623; 703; 740; 744; 751; 855; 904; 907; 911

**CLOSED 866-NXX'S:** ALL 0XX AND 1XX CODES (000-199)  
 555; 911

**CLOSED 877-NXX'S:** ALL 0XX AND 1XX CODES (000-199)  
 555; 911

**CLOSED 888-NXX'S:** ALL 0XX AND 1XX CODES (000-199)  
 555; 911

**Bulletin Number:** NUM-10-40      Page 2  
**Date:** 04-Oct-10  
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WEEK ENDING DATE	TOTAL NUMBERS IN USE	SPARE	GROWTH/WEEK		NUMBERS RESERVED DURING WEEK	NUMBERS SPARED FROM DISCONNECT	NUMBERS SPARED FROM RESERVED	NUMBERS SPARED FROM UNAVAILABLE	TOTAL SPARED DURING WEEK
8/28/2010	29,048,150	2,761,906	64,977		98,939	25,717	8,245	0	33,962
9/4/2010	29,052,710	2,757,346	4,560		46,951	29,606	12,785	0	42,391
9/11/2010	29,112,178	2,697,878	59,468		167,484	12,130	95,886	0	108,016
9/18/2010	29,116,336	2,693,720	4,158		49,237	27,688	17,391	0	45,079
9/25/2010	29,111,851	2,698,205	-4,485		48,241	40,459	12,267	0	52,726
10/2/2010	29,040,400	2,769,656	-71,451		59,162	112,435	18,178	0	130,613

If usage continues at the same level as the average growth rate for the last six (6) weeks, the estimated exhaust date for the current Toll Free number pool is as follows:

- (A) Total Spare Numbers = 2,769,656
- (B) Average Growth/Week = 9,538
- (C) Spare/Average Growth = 290 Weeks (estimated exhaust date of 04/23/16)

## SMS/800 NOTIFICATION

**Notification No:** NUM-13-48

**Date:** 25-Nov-13

**Subject:** Number Administration Summary Reports for Saturday, 11/23/2013 as of 11:59 PM, Eastern Time

	STATUS										
	WORKING	ASSIGNED	RESERVED	DISCONNECT	TRANSIT	UNAVAIL	SUSPEND	TOTAL NUMBERS IN USE	PERCENT IN USE	SPARE	TOTAL POOL (In Use + Spare)
<b>NPA: 800</b>	7,799,471	14	11,398	20,845	27,075	11,279	12	7,870,094	100.00%	0	7,870,094
<b>NPA: 855</b>	4,860,653	117	28,455	19,303	154,986	1,500	0	5,065,014	63.47%	2,914,986	7,980,000
<b>NPA: 866</b>	7,870,250	12	3,516	37,451	67,269	1,500	2	7,980,000	100.00%	0	7,980,000
<b>NPA: 877</b>	7,834,801	4	1,291	28,869	113,532	1,500	3	7,980,000	100.00%	0	7,980,000
<b>NPA: 888</b>	7,874,594	0	1,301	25,405	77,196	1,503	1	7,980,000	100.00%	0	7,980,000
<b>TOTAL:</b>	36,239,769	147	45,961	131,873	440,058	17,282	18	36,875,108	92.67%	2,914,986	39,790,094

**CLOSED 800-NXX'S:** ALL 0XX AND 1XX CODES (000-199)

271; 389; 415; 534; 623; 703; 740; 744; 751; 855; 904; 907; 911

**CLOSED 855-NXX'S:** ALL 0XX AND 1XX CODES (000-199)

555; 911

**CLOSED 866-NXX'S:** ALL 0XX AND 1XX CODES (000-199)

555; 911

**CLOSED 877-NXX'S:** ALL 0XX AND 1XX CODES (000-199)

555; 911

**CLOSED 888-NXX'S:** ALL 0XX AND 1XX CODES (000-199)

555; 911

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10/19/2013	36,441,003	3,349,091	-48,880	63,394	108,755	3,519	0	112,274
10/26/2013	36,489,553	3,300,541	48,550	80,155	16,303	15,302	0	31,605
11/2/2013	36,518,728	3,271,366	29,175	54,105	21,219	3,711	0	24,930
11/9/2013	36,563,526	3,226,568	44,798	57,901	7,008	6,095	0	13,103
11/16/2013	36,629,579	3,160,515	66,053	87,639	17,989	3,597	0	21,586
11/23/2013	36,875,108	2,914,986	245,529	273,986	18,782	9,675	0	28,457

The table below provides a range of exhaust dates based on the amount of historical data included in the statistical analysis as measured by the number of monthly observations (column A) through the most recent month. In each case, the monthly rate of change (B) for TFNs in Use is developed using a linear regression and usage is assumed to continue at that rate into the future. The quantity of spares as of the most recent month is divided by the growth rate to determine the estimated months to exhaust (C). The number of months to exhaust is then added to the date of the last monthly measurement to estimate the exhaust date (D).

Starting Date (Number of Observations) (A)	TFNs in Use Monthly Rate of Change (B)	Estimated Months to Exhaust (C)	Estimated Exhaust Date (D)
Jan 2007 (82)	166,282	20	Jun 2015
Jan 2008 (70)	183,696	18	Apr 2015
Jan 2009 (58)	204,945	16	Feb 2015
Jan 2010 (46)	206,309	16	Feb 2015
Nov 2012 (12)	277,553	12	Oct 2014

NOTE: One-time events, such as the 855 code opening, and large monthly increases and decreases in TFNs in Use are included in the regression analyses without modification or cleansing. Such events may strongly influence some estimates more than others, depending on sample length.





## Somos Notification

**Notification No:** NUM-17-15  
**Date:** 4/10/2017  
**Subject:** Number Administration Summary Reports for Saturday, 4/8/2017 as of 11:59 PM, Eastern Time

	STATUS										
	WORKING	ASSIGNED	RESERVED	DISCONNECT	TRANSIT	UNAVAIL	SUSPEND	TOTAL NUMBERS IN USE	PERCENT IN USE	SPARE	TOTAL POOL (In Use + Spare)
<b>NPA: 800</b>	7,816,954	4	2,962	25,712	13,172	11,284	6	7,870,094	100.00%	0	7,870,094
<b>NPA: 844</b>	4,751,085	40	38,580	13,995	107,106	1,501	0	4,912,307	61.56%	3,067,693	7,980,000
<b>NPA: 855</b>	5,890,680	495	3,581	10,767	29,465	1,499	1	5,936,488	74.39%	2,043,512	7,980,000
<b>NPA: 866</b>	7,405,270	3	3,142	18,529	27,956	1,501	3	7,456,404	93.44%	523,596	7,980,000
<b>NPA: 877</b>	7,451,666	7	14,065	19,196	29,823	1,501	2	7,516,260	94.19%	463,740	7,980,000
<b>NPA: 888</b>	7,518,034	48	18,735	18,199	26,909	1,503	3	7,583,431	95.03%	396,569	7,980,000
<b>TOTAL:</b>	40,833,689	597	81,065	106,398	234,431	18,789	15	41,274,984	86.40%	6,495,110	47,770,094

**CLOSED 800-NXX'S:** ALL 0XX AND 1XX CODES (000-199) ; 271; 389; 415; 534; 623; 703; 740; 744; 751; 855; 904; 907; 911

**CLOSED 844-NXX'S:** ALL 0XX AND 1XX CODES (000-199); 555; 911

**CLOSED 855-NXX'S:** ALL 0XX AND 1XX CODES (000-199); 555; 911

**CLOSED 866-NXX'S:** ALL 0XX AND 1XX CODES (000-199); 555; 911

**CLOSED 877-NXX'S:** ALL 0XX AND 1XX CODES (000-199); 555; 911

**CLOSED 888-NXX'S:** ALL 0XX AND 1XX CODES (000-199); 555; 911





## Somos Notification

**Notification No:**

NUM-17-15

**Date:**

4/10/2017

**Subject:**

Number Administration Summary Reports for Saturday, 4/8/2017 as of 11:59 PM, Eastern Time

WEEK ENDING DATE	TOTAL NUMBERS IN USE	SPARE	GROWTH/WEEK	NUMBERS RESERVED DURING WEEK	NUMBERS SPARED FROM DISCONNECT	NUMBERS SPARED FROM RESERVED	NUMBERS SPARED FROM UNAVAILABLE	TOTAL SPARED DURING WEEK
3/4/2017	41,485,401	6,284,693	70,736	112,687	37,541	4,410	0	41,951
3/11/2017	41,319,418	6,450,676	-165,983	38,870	191,740	13,113	0	204,853
3/18/2017	41,158,025	6,612,069	-161,393	115,403	274,100	2,696	0	276,796
3/25/2017	41,076,043	6,694,051	-81,982	38,710	118,523	2,169	0	120,692
4/1/2017	41,109,427	6,660,667	33,384	134,441	94,156	6,901	0	101,057
4/8/2017	41,274,984	6,495,110	165,557	278,338	110,198	2,583	0	112,781

The table below provides a range of exhaust dates based on the amount of historical data included in the statistical analysis as measured by the number of monthly observations (column A) through the most recent month. In each case, the monthly rate of change (B) for TFNs in Use is developed using a linear regression and usage is assumed to continue at that rate into the future. The quantity of spares as of the most recent month is divided by the growth rate to determine the estimated months to exhaust (C). The number of months to exhaust is then added to the date of the last monthly measurement to estimate the exhaust date (D).

Starting Date (Number of Observations) (A)	TFNs in Use Monthly Rate of Change (B)	Estimated Months to Exhaust (C)	Estimated Exhaust Date (D)
Apr 2008 (108)	182,613	37	Apr 2020
Apr 2010 (84)	178,618	37	Apr 2020
Apr 2012 (60)	158,419	42	Sep 2020
Apr 2014 (36)	90,149	74	May 2023
Apr 2015 (24)	55,479	121	Apr 2027
Apr 2016 (12)	8,548	783	Jun 2082

NOTE: One-time events, such as the 844 code opening, and large monthly increases and decreases in TFNs in Use are included in the regression analyses without modification or cleansing. Such events may strongly influence some estimates more than others, depending on sample length.

To Whom It May Concern:

You should create a temporary daily cap on the amount of new 855 numbers that may be taken per day, to prevent the few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers, like myself, need to build their businesses.

You are proposing to allow certain preferential groups to obtain 855 numbers before the small business employer can. This is a biased and prejudiced act on your part and unfair to businesses that are trying to distinguish themselves to the public and offer free trade and competition. We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Further, I am astonished that men and women who profess to be astute would allow such an action. Personally and as stated as harshly as possible, you should be the one's unemployed if you allow such an action.

## Comment for: 95-155 TOLL FREE SERVICE ACCESS CODES

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

In addition, the FCC should take a hard look at the existing 800/888/877/866 hoarding by some rouge resporgs. Because a few vanity number resporgs grab practically all of the 800 numbers coming out of disconnect and use the numbers for misdials or phone sex (refuse to sell them to end users), it is practically impossible for end users to get decent numbers. Releasing the new 855 area code wouldn't even be necessary if resporgs hoarding hundreds of thousands of the best phone numbers for themselves were broken up -- i.e., the anti-hoarding laws already on the books were actually enforced.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Parelli Natural Horsemanship  
P.O. Box 3729  
Pagosa Springs, CO 81147  
(970) 731-9400



August 30, 2010

Federal Communications Commission  
Office of the Secretary  
The Commission's Secretary  
445 12th Street, S.W.  
Washington, D.C. 20554

Dear Commission Secretary,

We need your help!

We are a small business that is trying to succeed in this challenging economic climate.

We have been trying unsuccessfully for the past few years to get a suitable vanity number for our business, to help our customers more easily reach us. Many of our customers are located in rural areas and are "low tech", and they primarily use the telephone to communicate with us. An easy-to-remember phone number would be of great use to these "technology-challenged" customers.

Unfortunately, I have come to learn that your commission has allowed the huge "resorgs" to hoard all of the vanity numbers, so businesses like ours cannot get a suitable vanity number. This is NOT FAIR to businesses like ours!

Now, a new block of 855 numbers is being allocated, and it appears that you may allow the resorgs to once again hoard all of the numbers. **Please don't let this happen again!**

Your commission should establish a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding this new allocation of 855 numbers that real businesses like ours need to succeed.

Thank you for your attention to this very important matter.

David A. Herrington II  
Chief Information Officer  
Parelli Natural Horsemanship

Please issue a temporary daily cap on the amount of 855 numbers that can be issued per day, to prevent a few vanity number businesses from unfairly hoarding a huge quantity of the 855 numbers that real customers need to build their businesses. I am one such customer who seeks to obtain three such numbers.



I am attempting to obtain an 855 number from the new release, and I am concerned that the government is granting a monopoly to large vanity number businesses. By tilting the playing field away from individuals and small companies, you are giving all the power to those companies who will abuse it. These large companies hoard numbers, keeping prices artificially high and therefore out of circulation. This artificial limit on supply raises prices for small business.

President Obama says one thing about helping small business when trying to get votes, then his FCC does the opposite by granting government monopolies and oligopolies to large hoarding companies. I am in the business of publicity and will let the public know which way you go on this before the November elections.

If this is what more regulation means, I'm for less regulation. Please stand on the side of small business so the President's words are not empty.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Sincerely,

James Lohse  
Reno, NV  
livingsteam@yahoo.com

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.



**M. KOBER LAW**  
A PROFESSIONAL LIMITED LIABILITY COMPANY  
ATTORNEYS AND COUNSELORS AT LAW

August 30, 2010

The Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street  
S.W., Washington, D.C. 20554

*Re: 855 Number Release*

To Whom it May Concern:

I am writing to make a comment on the release of the 855 toll-free number prefix. I am concerned about the big vanity number resporgs being able to claim all of the 855 numbers that will be released. Unless their ability to sweep up large amounts of numbers is limited, small businesses like mine are in an disadvantages position to compete in the market place and obtain numbers that are essential to our own marketing and self-promotion. Their ability to claim large blocks of numbers gives them an unfair advantage.

I strongly urge you to place a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that the real end-users need to build their businesses. Thank you for taking this comment under consideration.

Sincerely,

*/s/ Matthew R. Kober*

Matthew R. Kober  
Attorney at Law

We really need a cap on the amount of 855 numbers that can be taken per day, so as to prevent a few vanity number businesses from hoarding most of the 855 numbers that real customers need to build their businesses. It's not fair that small businesses like mine, then have to pay them exorbitant amounts to "buy" these numbers. Please limit the number of 855 numbers any one organization can get. There should certainly be a daily limit at least. Thank you!

Gary Schwaetz

8/30/10

To Whom It May Concern:

We need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few BIG vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

I am a small business owner based in Greensboro, NC. I launched my business 4 years ago to help companies improve their marketing over the phone and on their websites. Launching a business in the current economic environment hasn't been easy. Frankly we're a small fish in a BIG ocean, but we're swimmin' hard and we're starting to find our way.

When I found out about the 855 toll-free numbers becoming available I knew it would be a tremendous opportunity for our small company, because finally we would have a level playing field to get access to great marketing phone numbers.

Having a chance to get these phone numbers will give us a great advantage to help our customers and will be a tremendous asset to help our company grow. If we are able to get these numbers it would be a big win for our growing company.

So if you're at all inclined to see the little guy win please give us careful consideration when opening the 855 toll free numbers in September.

Sincerely,

Ryan Pitz

New Call Solutions®

To whom this may concern

This is a plea to allow the ordinary person to have a chance to get a new 855 number when they become available. I have waited two months to get an 855 number before printing any more brochures only to find that these big companies have an advantage over everyone - it is just wrong for someone to profit off of something that should be free.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Sincerely

Larry Willett, President

Pocket-Readers LLC

**Comments:** We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.



PAUL A. BODINE  
1819 NORTH LINCOLN PARK WEST  
CHICAGO, ILLINOIS 60614

August 30, 2010

The Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

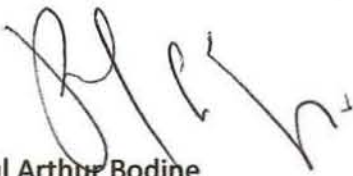
Re: Cap on 855 Numbers Needed to Ensure Fairness in Marketplace

To Whom It May Concern,

We small business owners need a fair opportunity to directly obtain vanity 855 numbers for our businesses, and escape the scalping from hoarders who prey upon us. We each only need one, and no one other than a scalper needs more than a few.

It is hard enough to compete in these troubled times, please place a cap on the number of 855 numbers that can be taken per day (5?).

Thank you for listening,

A handwritten signature in black ink, appearing to read 'Paul A. Bodine', with a stylized flourish at the end.

Paul Arthur Bodine

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses. Please do not let these brokers tie up all of these numbers and charge us thousands of dollars to buy it back from them. As a small business, we should have an equal right to these numbers as well. It is not fair to give aggregators a monopoly on the numbers and not give us an opportunity to get the ones that match our business. Thank you for your consideration.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses. Lets level the playing the field and give everyone a fair opportunity at access to these numbers.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

This is not the right way to approach this and the required cap should be in place to level the playing field and provide an equal opportunity for all who are interested.

A temporary daily limit on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from accumulating a huge amount of the 855 numbers that regular small business owners need to build their businesses.

Please allow us to compete with the big companies with technological advantages to amass huge numbers of numbers before anyone else can. Thanks.

800-323-0769  
800-323-9687 (fax)



[www.inter-facts.com](http://www.inter-facts.com)

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To whom it may concern,

It is unfair that big companies can hoard these new 855 numbers.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Bill  
William R Lamb  
License# 115.002067  
800.323.0769  
800.206.9459 (Cell)  
800.323.9687 (Fax)  
847.838.4436 (Local)  
[blamb@inter-facts.com](mailto:blamb@inter-facts.com)

Affiliations:

(NALI)-National Association of Legal Investigators

(NCISS)-National Council of Investigations & Security Services

***"Discover the Truth"***





Re:  
August 30, 2010  
Page 2

***"Discover the Truth"***

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

I provide marketing consulting services to small and medium-sized businesses. It is imperative that these business owners are allowed fair and equal access to the upcoming pool of 855 numbers. Many of my customers are seeking to build their brands through the use of new vanity numbers and I'm concerned they will be "shut out" during a virtual land rush.

Thank you for your consideration.

</TEXT>

First Consumer, LLC  
3900 NW 79<sup>th</sup> Avenue  
STE 222-228  
Doral, FL 33166

The Commission's Secretary  
Office of the Secretariat  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW.,  
Washington, DC 20554

REF: 95-155 TOLL FREE SERVICE ACCESS CODES

August 30, 2010

Sirs

I run a small marketing company employing an average of 20 people. Toll Free Access Codes are a vital ingredient of our business. We started our business in early 2007 and found it very difficult to obtain valuable toll free access numbers. The release of the new 855 codes presents an opportunity for end user like us to obtain valuable vanity numbers without having to pay exorbitant fees to hoarding RespOrg entities.

Thus, we request that your commission consider measures to restrict the issuance of large blocks for a period of time to allow for a more equitable distribution of these codes. Placing a restriction on the number of 855 numbers that any entity is allowed to absorb on a daily basis would be a simple solution.

Respectfully yours,

Paul A. Siska  
President  
First Consumer, LL

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

I have waited 10 years for the opportunity to enhance my business with a 8XX number. I have been defeated at each release by hoarders that re-sell the numbers that I have tried to attain to porn and gambling interests.

Is this the intent of the FCC? Or is it to help all commerce in a fair and even-handed manner?

## **Comment to FCC Regarding 855 Number Allocation:**

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real end users such as myself need to build our businesses. Do not allow just a handful of Vanity Number Resporgs to walk away with and hoard the lion's share of the good 855 numbers! The FCC is supposed to care about keeping the playing field level and fair – please do so. Institute a temporary daily cap on the amount of 855 numbers that can be taken per day. Give the real end users a chance!



Stewart Kuhlo, Director of Offline Marketing  
450 9<sup>th</sup> Street, 2<sup>nd</sup> Floor  
San Francisco, CA 94103

August 30, 2010

Dear Federal Communications Commission,

Please help our small business educate people!

My name is Stewart Kuhlo and I am the Director of Offline Marketing at Ampush Media. We started our company less than one year ago, and our mission is simple: Help students and universities connect. Our business assists Universities in marketing themselves to prospective students, while at the same time assisting students in finding a program and school that fits their specific needs. We run a number of websites that give students advice and look to connect them with relevant universities, specifically DegreeAmerica.com.

As we continue to grow our business, though, we plan to extend our portal websites to a phone service intended for students. Students will be able to call into the number and we will have a number of representatives ready to give them advice about going back to college. Our number will work for adults looking to go back to school, high school students, people who want to upgrade their careers and anyone else interested in attending college, both offline and online. Our representatives will spend time with students giving free, unbiased advice and then once the student chooses a program(s), we will connect them with the relevant university. We believe this will be a great service for students needing more information before choosing a school or degree program, and also helps universities find the right students. Education is such an important piece of our world and economy, and our goal has always been to create an extremely well-informed consumer base.

These numbers will be VERY helpful in enabling us to build awareness of our small business and pursue our mission of helping to educate people. These numbers are memorable and will be a perfect fit for our goal of educating prospective students, so we sincerely hope that our access is not blocked by large companies anti-competitively hoarding the numbers. We've been excited about the prospect of acquiring a new toll free number since the announcement in June, and greatly desire the opportunity to integrate a toll-free advice line into our existing product offerings.

However, we fear that without a temporary daily cap on the amount of 855 numbers that can be taken per day, vanity number companies will hoard a large number of the 855 area codes that real customers need to build their businesses. That is why we respectfully ask that the FCC put measures in place to prevent these anti-competitive practices from occurring.

Thank you very much for your time and consideration, and we hope that you will implement a temporary daily cap on 855 allocations to prevent vanity number businesses from hoarding a vital and necessary tool for our company.



Sincerely,

Stewart Kuhlo

To Whom It May Concern:

As a small business that struggles to compete with large commercial entities, we would ask that a daily cap be placed on how many 855 numbers can be consumed per day.

It is increasingly difficult for small businesses to be heard/seen in the shadows of companies that have what seem to be endless amounts of advertising capital.

It is common knowledge that a toll-free number that is pertinent and easy to remember can make a huge difference in sales for a small company.

It would be a shame, and could even have a small impact on local economies, if a few large companies sucked up most of the good numbers.

Sincerely,

Etsel Skelton

Founder and President, RescuTechs LLC

To Whom it May Concern,

Re: Toll Free 855 numbers

As a business owner for the past 30 years I could never understand why I could never get a good toll free number. After researching the industry I was amazed to find out that there are big companies that are allowed to do nothing but hoard toll free numbers and extort absurd costs in order to obtain said numbers.

This goes against everything America stands for and should not be allowed.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Please, help all the small businesses in America today.

Ken Mazda

As a small business looking for any competitive marketing advantage we can gain over other public, multi-national corporations, we spent the time researching where we may obtain this edge. One such opportunity that came to our attention was the release of the new 855 toll free prefix and we felt this would provide a level playing field opportunity to gain a vanity, marketing telephone number on par with the many multi-nationals. It has been brought to our attention that several large firms who are in the business of reserving and hoarding these numbers will destroy this opportunity by sitting on phone numbers they have no intention of putting into service anytime in the near future. Rather, they will sit on the number until they can score a large windfall from another multi-national corporation that will be able to afford their high fees for the purchase of these vanity numbers.

In contrast, a small business such as ourselves would immediately put the phone number into service and hopefully see an immediate tie to our brand.

As such, we really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses. This would greatly level the playing field between the large multinationals and the agile small businesses who have taken the time to research and plan for the 855 rollout by forcing the vanity number businesses to more selectively choose what numbers they attempt to reserve at the outset rather than allowing them to simply cast a massive net and reserve them all.

Thank you for your consideration in this matter.

95-155 TOLL FREE SERVICE ACCESS CODES

AUGUST 30, 2010

JIMI BREAZEALE

PRESIDENT

GET-A-MATTRESS <<http://www.getamattress.com/>>

WWW.LENGTHLOGIC.COM <<http://www.lengthlogic.com/>>

1450 W. BRANCH ST.

ARROYO GRANDE, CA 93420

805-481-3100

FAX 481-3900

WWW.GETAMATTRESS.COM

FILE 95-155

Commission Secretary

Office of the Secretary, Federal Communications Commission

Dear Secretary,

The new 855 exchange release is once again being hijacked by the huge number resellers.

I have been trying for 18 months to get a toll free number that would work well for our business. I have offered up to \$999.00 for special numbers, only to be told months later that it is unavailable.

Something is very wrong with the FCC system when the regular consumer is not served by the FCC.

It is scary to deal with the number brokers. It is difficult to know who trust, and what exactly they are promising you.

I think serving the public should be the goal of the FCC, not supporting those who prey on the public and charge huge fees for numbers that should be available free of charge from the FCC.

The unavailability of numbers at a reasonable cost is causing small businesses like mine irreparable harm, and it needs to be addressed before the 855 numbers are released.

Please protect us from the "Number Stealer's." Do not let this injustice continue any longer.

Kind regards,

Jimi Breazeale

Proceeding number 95-155

The Martindale Law Group  
1511 East Robinson Sr.  
Orlando, FL 32801

To Whom It may Concern,

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

It is really important for businesses to customize their numbers according to the services they provided. Having a customize number make it easier for people to identify a business among competitors. It is a key when it comes to advertising. There is a need for us to be able to get the numbers we have requested. Please make it fair to everyone.

Thank you,

The Martindale Law Group

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Thank you for the opportunity to express my concern and to have an equal chance to secure a preferred toll free number.

Dear FCC –

I'm a small internet start-up that has a small voice in the toll free number dispute. Please don't let big business crush the American Dream of small guys like me.

My hope of getting my own toll free # is through Bill Quimby and TollFreeNumbers.com. Without him I would not know where to turn on this issue.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Thanks,

Jesse Harris

1-855-776-6767



To whom it may concern,

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses. Branding is extremely important to small businesses like ours. It is not fair to let large companies get an advantage because they have more resources. We have requested only 2 vanity numbers for our business and it would be very disappointing if we could not get these due to these large hoarding of the numbers. We hope you will consider our concerns and comments and give the rest of us a fair chance.

Sincerely,

Julie Cash  
2808 Elm Street Unit 2  
Los Angeles, CA 90065  
Groovetickets.com

Matthew Webbeking  
3518 SW Cloverdale St.  
Seattle, WA 98126

August 30, 2010

The Commission's Sec.  
Office of the Secretary, FCC  
445 - 12th St. SW  
Washington D.C. 20554

*Re: File #95-155  
Toll-free Access Service Codes*

Dear Sir or Madam:

When the 855 toll free numbers are released this Fall, please implement a cap on the amount of numbers the large phone service providers may take.

I am a small business owner and entrepreneur. Phone numbers are very important when starting a business. The FCC should protect small business owners, and allow them access to resources such as this, which in turn will stimulate our economy.

Hopefully you realize that a small number of very large phone service companies hoard phone numbers, and attempt to make money from them by leasing them out or monopolizing them, often tied to the sex industry, according to Bill Quimby with Tollfreenumbers.com.

Bill has helped countless small business owners, and the FCC should carefully consider the information he provides, on behalf of people like myself.

Very Truly Yours,

*/s/ Matthew S. Webbeking*

Matthew S. Webbeking

Request to Impose Daily Limit  
to Prevent Hoarding by Vanity Number  
Businesses

August 30, 2010



FAT BEAR  
INCORPORATED

The Commission's Secretary,  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Proceeding #95-155 Toll Free Service Access Codes**

FCC Representative:

As a small business owner seeking to obtain one of the 855 area code numbers that will match our company's trademarked name (855-FAT-BEAR), I am very concerned that your present process allows a few vanity number businesses to hoard the upcoming 855 area code numbers on a speculative basis without immediate customers looking to actually use those numbers. Such speculative transfer of ownership harms customers like me.

I urgently request that you impose either a daily limit or some other mechanism that prevents hoarding by these speculative buyers so that (1) actual end-users have a fighting chance of acquiring the 855 area code numbers they need; (2) actual end-users can acquire 855 area code numbers at a reasonable cost; and, (3) the 855 brand is not damaged by the actions of a few large vanity number reselling businesses.

I respectfully request that you give my request positive consideration and let me know what you decide on this matter.

Best regards,

Stephen Amerige, President  
Fat Bear Incorporated  
tollfreenumbers@fatbear.com

Pamela M. Smith  
THE-E-DECORATOR.COM  
PO Box 180  
Minneola, FL 34755  
Pamela@The-E-Decorator.com

The Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

***RE: File number 95-155 (cap on 855 numbers)***

Dear Sir or Madame:

Please strongly consider a cap on the number of 855 telephone numbers taken by large corporations each day. This will prevent hoarding and price gouging by companies wishing to resell them.

***There are businesses in America that NEED these numbers to secure their brand and grow their businesses***, and if the numbers are unavailable or the businesses are charged a huge fee by a reseller, their businesses will suffer.

***I have just created what I believe is a new niche within my market.*** I have a strong idea, a strong business name, a strong website URL, and I plan to do business with clients across the country. ***If I have the 855 number to ADD to that unified brand, it will strengthen my position as a serious, strong business, and will set me up as a strong competitor within this niche.*** Without it, things just won't work together as a complete marketing package.

To add to the strength of my case, ***I am currently disabled, and am seeking a way to do business in a way that will ADD dollars to the economy***, not drain them by staying on Social Security Disability.

Please consider my case ... ***the telephone number I would like is 855-EDecor8 (855-333-2678).***

The FCC's capping the number of 855 numbers released each day will enable me to create a business and a brand that is strong, and that strengthens the United States economy.

Regards,

Pamela M. Smith  
[Pamela@The-E-Decorator.com](mailto:Pamela@The-E-Decorator.com)

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

## Ron Selby

11898 Tempest Harbor Loop, Venice, FL 34292  
941-488-9000 · 800-488-9909 · email@ronselby.com

The Commission's Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.,  
Washington, D.C. 20554.

August 30, 2010

Re: File Number: 95-155 / 855 Toll Free Allocation Rules  
**Please approve a "temporary cap" against phone companies taking 855 numbers!**

Dear Sir or Madam:

I'm an entrepreneur and website creator of many ventures. As a small business owner and entrepreneur I ask that you please put in place a TEMPORARY CAP against large phone companies from hoarding up thousands of 855 prefix toll free numbers.

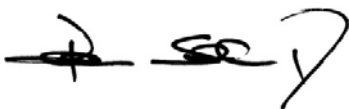
Unless your agency puts in place a CAP against phone companies taking for their own use hundreds to thousands of numbers upon their release next month, this will cause irreparable harm to actual end users like myself. For example, I own and use 866-RON-SELBY and 877-RON-SELBY. **The only temporary solution is a temporary anti-hoarding cap to limit the number of 855 reservations each organization could make per day.**

Past and present project accomplishments as an end user include the following utilizing toll free numbers:

- Past owner of 1-866-HOMELOAN (www.866homeloan.com) d/b/a HomeLoan Marketing Inc.
- Creator and owner of www.labordayreunion.com (family website in memory of my father), 866-RONSELBY
- Owner of www.moneyinstructions.com, 877-MIHOTLINE, 877-MICALENDAR, 877-MIPROGRAM
- Owner of www.millionairesdinner.com, 877-RONSELBY
- Owner of www.sarasotarental.com & www.spartarentals.com, 800-488-9909
- Owner of www.settlementexpert.com, 888-50EXPERT

Please Help! Should any further explanation be needed, please call me directly at 941-488-9000 or 800-488-9909.

Sincerely,



Ron Selby

We need a fair way to secure our 855 numbers. I am writing to beg and plead for the number 1-855-466-4227 and the number 1-800-825-3227. Given the nature of our mission is to provide trusted resources for the estimated 34 million unpaid family caregivers seeking qualified care providers a simple phone number with few memorable digits can be vital to caregivers in difficult or stressful situations that may require fast action. 1-855 homecare and 1-855 takecare are the two numbers that would help us support patients. Our enterprise is driven by the conviction that enabling a loved one to remain safely in the comfort of his or her home is the most efficient and compassionate way to care for individuals who have chronic conditions but who do not require hospitalization or nursing-home facilities. However, it is currently not easy to obtain reliable online information regarding the quality and availability of home care, and individuals tasked with finding in-home assistance are faced with a daunting challenge and no clear path. The easy-to-remember phone number we are requesting will help individuals secure qualified help for their families wherever and whenever they need to do so. I decided to start homecare.com when my grandmother began to suffer from Alzheimers. I see her on a daily basis, so I have experienced firsthand the emotional heartache and challenging responsibilities involved in caring for a loved one in physical and mental decline. While family and friends may feel they can look after ailing or elderly individuals on their own, this option is not always feasible. The challenges of blending daily life with the responsibilities of caring for a beloved relative frequently lead to stress, anxiety and depression on the part of the caregiver. For example, roughly half of unpaid family caregivers need to modify their work schedule outside the home to accommodate their new responsibilities, which can cause a drop in salary and benefits and thus trigger increased worry. And perhaps more devastating, elderly spousal caregivers with a history of chronic illness themselves who are experiencing caregiving-related stress have a 63% higher mortality rate than their non-caregiving peers. A simple phone number will be a great service to the millions of Americans who are now searching for reliable home care information, and given that one-fifth of all Americans will be 65 or older in just 20 years, the demand for an infrastructure to support home care will only become more urgent. We would very much appreciate your support in this matter. Please do not hesitate to contact me if you require further information about homecare.com.

IN my personal situation I have found a number that I desperately need for my business and It is not being used and dail800 has the number, which they are hoarding this company is not using this number and the only way I can get the number is to pay them several hundred dollars a month to use the number and they offer call tracking.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Now we do not need this to happen with 1 855 numbers

I need this number for my business, my entire business model is centered around the 1 855 ASK Toni Vanity number.

Please do not let this happen again

thank you

Toni House



I am a small business person who helps property owners market their shopping centers for lease. We use vanity toll free numbers as a cornerstone in our marketing approach. Based on what I've learned about the upcoming release of 855 numbers, I think there needs to be a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses. Thank you.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers like me need to build our business

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

To whom it may concern,

I would like to add my voice to all the other small business operators trying to acquire a new 855 number custom fit to our company. We are not a large "vanity number" business with resources to buy, hoard and resell thousands of numbers just for the profit. We are a growing Internet site with one name, trying to buy one number. The only way we stand a chance of doing so is if the FCC places a temporary daily cap on the amount of 855 numbers that any one company can register in any one day.

Thank you for your consideration.

Alan Baklor | IT Manager



Jerusalem Technology Park | P.O. Box 48253 | Jerusalem 91481, Israel  
T: 972.2.649.5156 | M: 972.54.554.0156 | U.S. M: 866.839.0058 | F:  
972.2.649.5001 | [alanb@answers.com](mailto:alanb@answers.com)

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We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

I have been trying to get appropriate 800 numbers for my business for several years. I am now in the position of having to pay a vanity number company a monthly fee to find a number that works for my business. Why should I have to do this? These companies are not adding any value to the business. They are just taking advantage of the opportunity given to them by the government to hoard toll-free numbers. I am the one that is adding to the economy by creating jobs.

Please do not let this happen any longer. Please impose a temporary daily cap on these new numbers.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

I whole heartedly agree with Bill Quimby's proposal on how the 855 numbers should be distributed.

Allow government to take the position of fostering competition not restricting it to a few large companies.

Please feel free to contact me with any additional questions or comments.

To whom this may concern,

I'm 27 years of age and for the first time in my life; I realized that the "American Dream" does NOT exist behind the walls of my 10x10 cubicle. It doesn't matter what my salary is, it will never be as satisfying as starting, developing and maturing my own business. The first step in this process is obtaining my vanity number. I was pleased to know that 855 was available for the phone # I desired. It will be a great disappointment if a large company bought my number, only to sell it back to me at a higher rate.

Please help by placing a cap on obtaining vanity numbers. Failure to do so, in my opinion is no different than supporting ticket scalping.

Thank you in advance,

Leon W.





August 31, 2010

Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.,  
Washington, D.C. 20554.

RE: Proceeding # 95-155 TOLL FREE SERVICE ACCESS CODES

Dear FCC:

I've recently been informed of your decision to not cap the upcoming 855 vanity number distribution. This will have a very adverse affect on businesses such as mine, because obtaining a memorable toll-free number at a reasonable expense is important to our marketing success. If large companies that broker these numbers are allowed to buy them all in the first few minutes, then these numbers will become too expensive for companies like mine to purchase them.

I've been unsuccessfully trying to purchase an appropriate vanity number for my business for several years. The ability to acquire an 855 number will be a boost to my ability to market my company.

**I STRONGLY ask that you enforce a temporary daily cap on the amount of 855 numbers that can be taken per day**, so as to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that we real customers/end users need to build our businesses.

Thank you for your consideration.

God Bless,

Buzz Park  
Internet Marketing Consultant  
Area President

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Dear Concerned at the FCC,

We very much need a daily cap on the number of 855 phone numbers that can be taken per day by any single organization. We need this cap to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers; toll-free numbers that real customers need to build their real job-creating businesses.

I'm a serial entrepreneur who has started no less than a half dozen companies in my career, and I have plans for many more to come. These companies, of course, have all started as small businesses, but always with high aspirations to grow into large, thriving, tax-paying enterprises that create jobs that employ and pay people -- real people; local people -- not offshore, but here in this country.

I AM small business, and I AM the life blood of our country, and our country's economy. New ideas, new companies, and good 'ol competition that challenge the entrenched and the status quo; THIS is what makes our country and economy so strong.

But like a small seedling that needs to be nurtured and protected to grow, small businesses need the government to help it survive in its early days, otherwise the large "trees" near it will suck all of the water and nutrients from the soil around it, tower over it, and block the sun.

The present allowance of hoarding toll-free phone numbers by a single large company is a perfect example of the way in which small businesses have been crowded out, and greatly hurt in the process. Today, and through the many times I've confronted this issue with the plurality of companies I've started, it's next to impossible for me to get a toll-free phone number that spells out the name of my business(es). Why? Because all of these numbers have been taken by only a handful of companies with deep pockets. Is it really good to deny smaller companies the ability to leverage a strong marketing tool, simply because the competition took advantage of the system to stymie the little guy? I think not.

With the release of the 855 toll-free code, the FCC and the government now have the perfect opportunity to rectify this imbalance that hurts small fledgling business, thwarts a thriving competitive marketplace, and, in general, hurts our economy at the very time our country can least afford it.

Accordingly and again, I strongly urge you to place a daily cap -- perhaps if only temporary -- on the number of 855 numbers that can be taken per day by any one company.

Thank you for your consideration in this matter.

Sincerely yours,

Jeffrey W. Briggs

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We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

I reserved five numbers for my company and we really need these to fulfill customer requirements. These five numbers will allow us to better serve our customer's needs and provide them and us with resources to help our business grow.

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses. We have been trying for years to get an 800 number that best represents our business and now we finally have a chance. I don't believe that a small number of companies should have access to most of these new numbers in order to create a business of reselling these numbers instead of allowing us to increase our business. The process should be fair to all.

To Whom It May Concern:

As a small business owner, I wish to object to the practice, that the FCC allows, for “vanity number” companies to reserve thousands of toll-free numbers and essentially “hoard” them, for future resale. This deprives legitimate businesses from receiving the numbers they request from the FCC.

I’m referring specifically to the release of the new “855” series of numbers coming up in October. What is needed is a temporary cap on the amount of #s that can be reserved in a day, so that these companies cannot automatically via computer “hog” all the available numbers.

Thank you for your attention to this matter and for taking the concerns of small business and private citizens into account, over the concerns of “big business”.

### *Reserving 855 numbers for our organization*

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We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

PSU Hershey has been trying to secure 8XX toll free numbers to brand our business and make it easier for the community to remember our numbers. We recently reserved some numbers from [www.855numbers.com](http://www.855numbers.com)\* after much frustration dealing with RespOrg Locked issues for existing 800, 866, 877 and 888 numbers. I have a list of the following numbers reserved in hopes that when the 855 opens in October, we will finally have these available for our use:

855-467-7464	855-GOPSHMG
855-774-5437	855-PSHKIDS
855-855-5558	
855-467-7424	855-GOPSHCH (and 855-GOPSHCI)
855-467-7484	855-GOPSHVI
855-437-7439	855-HERSHEY
855-531-1111	
855-531-5555	
855-422-6237	855-4CANCER
855-531-0000	
855-467-7462	855-GOPSHMC
855-225-5462	855-CALLHMC
855-531-8585	

\*Each reserved number cost \$8.55 on their web site.

I spoke with someone at the FCC regarding difficulties securing numbers and there really is no advocate for individual businesses. It's impossible to work directly with the current owners of these numbers. When calling 8XX numbers that we want, they are either disconnected, busy or parties who make decisions about their toll-free numbers will never return our calls. Having RespOrgs buy up all the numbers first and hoard them impedes our ability to secure these known to available numbers today. I am concerned that we haven't been able to negotiate for existing numbers and the same will be true of the 855 range which is totally unacceptable. End users should be able to reserve numbers now without having them bought out from under us by a RespOrg like PrimeTel.

The Executive Director at PSH Alan Brechbill and Chief Marketing Officer Sean Young have instructed me to reserve these numbers however, I have no guarantee that we will be able to advertise and use



them if the proposed FCC process for allowing RespOrgs first pick is allowed. Please provide us some ability to reserve these numbers so we can meet our business needs.

Sincerely,

Sherry L. Mettley  
Director of Infrastructure and Telecommunications  
Penn State Hershey Medical Center  
717-531-5558  
[smettley@hmc.psu.edu](mailto:smettley@hmc.psu.edu)

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I am a small business owner and for mw to start out with a good competitive edge, numbers like these will help. If big companies come and sweep up all the good numbers it never gives a small owner like me a chance. We need to keep the playing field a little more level

Thank you

Hans Driesen

Our company was excited to learn that the FCC has opened the new 855 numbers. However, the FCC's goal of opening new marketing opportunities for small business is being frustrated. As a small business, we simply cannot compete with vanity number businesses that automate their volume acquisition of 855 numbers, and then charge huge resale or rental fees for these numbers. I urge the FCC to limit the quantity of 855 numbers that can be acquired by any one entity. I think only a short window, maybe 60 days, is needed to ensure our 855 number requests are treated fairly. Thank you.

Acquiring a desired vanity toll-free number has been a very difficult, if not impossible feat. A large, technologically-savvy telecom company immediately hoarded a toll-free number we were interested in within .01 seconds of the number becoming available. Every time I call the number (even 9 months after the large resporg hoarded it) it's a dead line-no rings, no answers; nothing. The company holds on to the number and does absolutely nothing with it, which is illegal. Furthermore, they are not accountable-calls to the company that own the line are directed to a random voicemail box.

We have a legitimate business interest in using the number to conduct business and the hoarding of toll-free numbers handcuffs businesses across America who want to use numbers legitimately. If President Obama really wants to help small businesses, we really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to revert a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Thank you.

To Whom It May Concern,

We really need a temporary daily cap on the amount of 855 numbers that can be taken per day, to prevent a few vanity number businesses from hoarding a huge amount of the 855 numbers that real customers need to build their businesses.

Sincerely,

Robert Laskey

Federal Communications Commission  
Chief, Wireline Competition Bureau  
Sharon E. Gillett  
445 12th Street, SW  
Washington, DC 20554

9/3/10

[sharon.gillett@fcc.gov](mailto:sharon.gillett@fcc.gov)  
(202) 418-1500

Ms. Gillett,

I understand that the new 855 toll free numbers will be made available in October.

In these tough economic times, the small business owners are fighting tooth and nail to stay afloat, and any advantage that comes their way is heartily welcomed.

For YEARS, I have been waiting / wanting a toll free number that would offer a marketing advantage. I am hoping that with the release of the 855s, that I will finally have the chance to get my "special" number.

As your system is set up, however, I understand that most of the "choice" numbers (numbers that are easy to remember / easy to dial) will be quickly reserved or taken by a few large companies that will demand a hefty premium to resell these numbers to the end users (small business owners) like me.

The system that you have currently is patently unfair to the small businesses.

As the FCC, it is your job to make sure that these numbers are handed out EQUITABLY, not just a "First come / first served / take as much as you want or AFFORD" manner.

Please implement a fairer distribution system so that the small business owners have a fighting chance of getting what they need at a reasonable price.

A system limiting the quantity of numbers one company could buy per hour or per day would at least provide some form of "leveling" of the playing field.

Thank you for your time and consideration.



K. Kim  
President, KCSM Inc.  
[www.biceptacle.com](http://www.biceptacle.com)

We are a small company and have had an extremely difficult time getting a "Vanity 800 Number" that works with our business. I know of at least one Non-Profit organization that has experienced this same difficulty. It seems like the advantage is really on the side of large companies/corporations. We ask that you consider, at a minimum, a temporary daily cap on the amount of 855 numbers that can be taken per day. This will prevent a few companies from hoarding a huge amount of the 855 numbers that real customers like us need to build our businesses. Additionally, we recommend you consider a permanent daily cap if you find it keeps up with the demand for new number request from bonifide "End Users".

Thank You for Your Support,  
Rodger Baldwin  
COBY Investments, LLC

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# P. J. LYNCH ASSOCIATES



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